

# SMITH MAZURE

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Please Respond to:  
New York, NY

July 12, 2019

Magistrate Judge Gary R. Brown  
United States District Court, Eastern District of New York  
United States Courthouse  
100 Federal Plaza  
P.O. Box 9014  
Courtroom 840  
Central Islip, NY 11722-9014

Re: Jam Coins, Inc., David Weinstein v. PMA Companies, Pennsylvania Manufactueres' Association Insurance Company, PMA Insurance Group, Roundtop Insurance Group, North American Collectibles Association, Inc., John Doe 1-3, ABC Corp. 1-3  
Index No. : 2:19-cv-00904 (JS) (GRB)  
D/L :  
Our File : PMA-00797

Dear Magistrate Brown:

As you are aware, this office represents defendants PMA Companies, Inc., i/s/h/a PMA Companies and Pennsylvania Manufactueres' Association Insurance Company i/s/h/a Pennsylvania Manufactueres' Association Company in reference to the instant matter. At the current time, pursuant to the Court's prior order a conference has been scheduled before this Court on **September 10, 2019 at 11:00 a.m.** Unfortunately, I have been advised that I am required to appear in Supreme Court, New York County on that same date for an oral argument on a very long awaited and complex insurance coverage litigation matter. Both these appearances are matters which only the undersigned has the familiarity and/or expertise to handle. As such, I respectfully request that the Court consent to a very short adjournment of the September 10<sup>th</sup> date. The undersigned is available on any other date subsequent to September 10<sup>th</sup> in the month of September. Obviously, if either the plaintiff or my co-defendant have any dates they are not available, I will comply with any reasonable requirements they may have.

Magistrate Judge Gary R. Brown

Page 2

July 12, 2019

In addition, I would like to note that at this time we have received no responses to any demands previously served on plaintiff's counsel pertaining to discovery. While I do not believe that the deadline has yet passed for their compliance, I would note that it is necessary to hold off depositions until they have provided the requested items.

Thank you for your cooperation

Respectfully yours,

SMITH MAZURE DIRECTOR WILKINS  
YOUNG & YAGERMAN, P.C.

By: 

JOEL M. SIMON

JMS/myw

cc: **VIA ECF**

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